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and Casualty Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HEATHER RINGO, an individual

Plaintiffs,

vs.

**GARRISON PROPERTY AND
CASUALTY INSURANCE COMPANY**, a
foreign corporation, DOES 1 through 10;
XYZ CORPORATIONS 11 through 20; and
ABC LIMITED LIABILITY COMPANIES
21 through 30, inclusive,

Defendants,

Case No.: 2:24-cv-00013-JAD-EJY

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY DEADLINES**

(FIRST REQUEST)

Plaintiff, Heather Ringo (“Plaintiff”), and Defendant, Garrison Property and Casualty Insurance Company (“Defendant”) have agreed to extend the discovery deadlines by 90 days. This is the Parties first request for an extension. In support of this Stipulation the parties state as follows:

A. DISCOVERY THAT HAS BEEN COMPLETED

Plaintiff

1. Plaintiff made initial disclosures on February 5, 2024.
2. Plaintiff supplemented her initial disclosures on May 23, 2024.
3. Plaintiff sent Defendant requests for production and interrogatories, and Defendant responded to that discovery.

Defendant

1. Defendant made initial disclosures on February 5, 2024.
2. Defendant made its first supplemental disclosures on April 2, 2024.
3. Defendant subpoenaed approximately 20 Plaintiff's medical providers/ pharmacies.
4. Defendant is in the process of drafting discovery to send to Plaintiff.

B. DISCOVERY REMAINING

1. Plaintiff's supplemental FRCP disclosures;
2. Defendant's supplemental FRCP disclosures;
3. Defendant written discovery requests;
4. Initial and supplemental expert disclosures;
5. Independent Medical Examination of Plaintiff;
6. Deposition of Plaintiff;
7. Deposition of Defendant;
8. Depositions of the parties' lay witnesses;
9. Depositions of the parties' expert witnesses; and
10. Any other potential depositions or written discovery which may become necessary as discovery continues.

**C. REASONS REMAINING DISCOVERY CANNOT BE COMPLETED WITHIN
THE TIME SET BY PRIOR DISCOVERY PLAN**

The parties have engaged in discovery in this case. Given the nature of the case (personal injury), Defendant had to subpoena Plaintiff's medical records—a time intensive and necessary process. The parties are now working cooperatively to arrange Plaintiff's medical exam, and arrange dates for depositions. Good cause exists for this extension because they are working cooperatively in discovery, and to be respectful of professional and summer schedules for both clients and counsel.

No party will be prejudiced by the extension, and the requested extension is made in good faith and not for purposes of delay. Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the deadline by 90 days in accordance with the requested amended discovery deadlines.

D. CURRENT SCHEDULE FOR COMPLETION OF DISCOVERY

Last day to amend pleadings and add parties:	July 5, 2024
Last day to disclose initial experts:	August 5, 2024
Last day to disclose rebuttal experts:	September 4, 2024
Close of Discovery:	October 3, 2024
Last day to file Dispositive Motions:	November 4, 2024

~~PROPOSED~~ DISCOVERY DEADLINES:

Last day to amend pleadings and add parties:	October 4, 2024
Last day to disclose initial experts:	November 4, 2024
Last day to disclose rebuttal experts:	December 4, 2024
Close of Discovery:	January 6, 2025
Last day to file Dispositive Motions:	February 6, 2025

E. CURRENT TRIAL DATE

A trial date has not been set.

This request is made in good faith and not for the purpose of delay.

DATED this 11th day of June, 2024.

SPENCER FANE, LLP

/s/ Mary E. Bacon

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Attorney for Plaintiff

ORDER

IT IS SO ORDERED.


U.S. MAGISTRATE JUDGE

Date: June 11, 2024